

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her capacity
as trustee of CHARLIE JAVICE 2021
IRREVOCABLE TRUST #2, and CHARLIE
JAVICE in her capacity as trustee of CHARLIE
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

C.A. No. 1:22-cv-01621-JDW

**DECLARATION OF JACOB R. KIRKHAM IN
SUPPORT OF DEFENDANT OLIVIER AMAR'S REPLY BRIEF IN
FURTHER SUPPORT OF HIS MOTION TO PARTIALLY LIFT THE PSLRA
DISCOVERY STAY TO PERMIT DOCUMENT DISCOVERY AND
TO JOIN IN DEFENDANT JAVICE'S MOTION SEEKING THE SAME RELIEF**

I, Jacob R. Kirkham, hereby declare as follows:

1. I am a partner at Kobre & Kim LLP, and I represent Defendant Olivier Amar in the above-captioned matter.
2. I submit this declaration in support of Defendant Amar's reply brief in further support of his Motion to Partially Lift the PSLRA Discovery Stay to Permit Document Discovery and to Join in Defendant Javice's Motion seeking the same relief.
3. I make this declaration based on personal knowledge of the facts set forth herein and can competently testify to those facts if called as a witness.

4. Attached as Exhibit 1 is a true and correct copy of a June 16, 2023 through June 21, 2023 email correspondence between Kobre & Kim LLP and Potter Anderson & Corroon LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 22, 2023, in Wilmington, Delaware.

/s/ Jacob R. Kirkham

Jacob R. Kirkham